

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

SANDRA SIBLEY JACKSON, an individual,

Plaintiff,

vs.

DIMENSIONAL COMMUNICATIONS,
INC., a Connecticut corporation, and
CHRISTOPHER S. CROWELL, its CEO, an
individual, and UP WITH PAPER, LLC, an
Ohio limited liability company, and GEORGE
WHITE, its President, an individual.

Defendants.

Civil Cause No. _____

**COMPLAINT FOR COPYRIGHT
INFRINGEMENT**

Plaintiff, Sandra Sibley Jackson, alleges:

PARTIES

1. Plaintiff. Sandra Sibley Jackson, an individual, resides in Seattle, Washington.

Plaintiff is the owner of U.S. Copyright Registration. VA 1-354-972, Exhibit A attached hereto.

2. Defendants. Defendants are:

2.1 DIMENSIONAL COMMUNICATIONS, INC., a Connecticut corporation, having a principal place of business in Old Saybrook, Connecticut.

2.2 Christopher S. Crowell, an individual, residing in the state of Connecticut. Mr. Crowell is the President and CEO of Defendant Dimensional Communications, Inc.

2.3 Up With Paper, LLC, an Ohio limited liability company, having its principal place of business in Mason, Ohio.

2.4 George White, an individual, residing in the state of Ohio. Mr. White is the President of Up With Paper, LLC.

JURISDICTION AND VENUE

3. This action arises under the copyright laws of the United States, Title 17 U.S.C. § 101, *et seq.* This court has jurisdiction over the copyright claims under 17 U.S.C. § 101 *et seq.*; 28 U.S.C. § 1331 (federal question); and 28 U.S.C. § 1338(a) (copyright).

4. Personal jurisdiction is appropriate pursuant to *Calder v. Jones*, 465 U.S. 783 (1984), *Schwarzenegger v. Fred Martin Motor Co.*, 374 F.3d 797 (9th Cir. 2004), and related authorities. As set forth below, Defendants intentionally engaged in transactions through which they purposefully availed themselves of the legal protections and benefits of the state of Washington, and which they knew would cause harm to Plaintiff in the state of Washington. As a result of Defendants prior licensing of copyright from Plaintiff, Defendants knew that Plaintiff maintained her business in Washington. Defendants also expressly and intentionally directed their subsequent publication and distribution of infringing works in Washington by making the infringing works available for distribution to purchasers in Washington, and by selling infringing works and other products through a continuously interactive commercial website.

1 and ability to supervise the infringing conduct and a direct financial interest in the infringing
2 activity.

3 12. Defendants have violated Plaintiff's exclusive rights of reproduction and
4 distribution.

5 13. The foregoing acts of infringement were willful, intentional, and in disregard of
6 and with indifference to the rights of Plaintiff.

7 14. As a result of Defendants' infringement of Plaintiff's exclusive rights under the
8 Copyright Act, Plaintiff is entitled to relief pursuant to 17 U.S.C. § 504 and attorneys' fees and
9 costs pursuant to 17 U.S.C. § 505.

10 16. The conduct of Defendants is causing, and unless enjoined and restrained by this
11 Court, will continue to cause Plaintiff irreparable injury that cannot fully be compensated or
12 measured in money. Plaintiff has no adequate remedy at law. Pursuant to 17 U.S.C. §§ 502 and
13 503, Plaintiff is entitled to injunctive relief prohibiting Defendants from further infringing
14 Plaintiff's copyright and ordering that Defendants destroy all infringing copies made in violation
15 of Plaintiff's copyright and ordering the destruction of all molds, matrices, tools and dies for
16 making infringing copies.

17 17. As a result of Defendant's willful infringement the case is exceptional and
18 Plaintiff is entitled to enhanced statutory damages.

19 **PRAYER FOR RELIEF**

20 WHEREFORE, Plaintiff prays:

21 A. for an award of all direct and consequential damages, including, at Plaintiff's
22 election, statutory damages pursuant to 17 U.S.C. § 504;

1 B. for Injunctive relief restraining Defendants from further publication of infringing
2 materials or other infringement of Plaintiffs' copyrighted works pursuant to 17 U.S.C. §§ 502
3 and 503 and for an order requiring the destruction of all infringing works and the molds,
4 matrices, tooling and dies for making infringing copies;

5 C. for an award of Plaintiff's Attorneys' fees and costs awardable under 17 U.S.C. §
6 505;

7 D. for an award of post-judgment interest on the entire judgment until paid in full;
8 and

9 E. For such other and further relief as the Court deems just and equitable.

10 DATED: May 1, 2015.

11 By: /s/ Rex B. Stratton
12 Rex B. Stratton, WSBA No. 1913
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